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*Sarah Chinberg
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Holly Tapani
Product Manager ENERGY STAR HVAC
U.S. Environmental Protection Agency
ENERGY STAR HVAC Program

By E-mail

RE: Midea Comments on ENERGY STAR Versions 6.0 and 7.0 Room Air Conditioner (RAC) Draft 1 Specifications

Dear Holly Tapani:

Midea America Corp. (“Midea”) imports and sells various home appliances, including room air conditioners, in the US. We are grateful for your efforts in developing the ENERGY STAR Versions 6.0 and 7.0 Room Air Conditioner (RAC) Draft 1 Specifications and welcome the opportunity to provide input.

Midea supports EPA’s updates regarding heating mode efficiency for RHP’s in Version 6.0, while leaving other requirements unchanged.

However, Midea strongly encourages EPA to adopt a standard that requires heating capacity at 47°F to match cooling capacity at 95°F. The current specification would permit manufacturers to derate their heating capacity, which will likely cause consumer confusion.

Midea supports Type 3 RHPs requiring a 70% capacity ratio at 17°F/47°F. This aligns with the CEE Residential Room Heat Pump Specification.

Midea strongly requests that EPA reevaluate the stated payback periods for Room Heat Pumps because we believe them to be inaccurate. Our team would gladly assist in such an effort in relation to the next revision.

Midea appreciates EPA’s alignment of Version 7.0 with the new federal minimums for RACs, effective May 26, 2026, as well as the lead time provided to manufacturers.

Midea supports a labeling requirement for the purpose of minimizing misleading marketing.

Consumers need to be aware of the differences between the four types of RHPs. Midea will provide additional input regarding labeling and an appropriate graphic in the near future.

Thank you for your consideration. Should you have any questions or wish to discuss any of the points made in this letter, please call me.

Best Regards,

Sarah Chinberg

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